



901 N Tatnall Street, 2<sup>nd</sup> Floor  
Wilmington, DE 19801  
(302) 576-5310  
bonnie.l.metz@verizon.com

October 24, 2016

Donna Nickerson, Secretary  
Delaware Public Service Commission  
861 Silver Lake Boulevard  
Cannon Building, Suite 100  
Dover, DE 19904

**EXPURGATED COPY**

Dear Ms. Nickerson:

Re: Verizon Delaware Safety-Valve Relief Application

In accordance with the requirements of the Delaware Public Service Commission's May 22, 2007 order at Docket No. 07-99, Verizon Delaware LLC ("Verizon DE") submits the attached application for additional numbering resources.

The enclosed documents contain proprietary information. Verizon DE respectfully requests that the Commission protect this information accordingly.

Enclosed is a check to cover the filing fee. If you have any questions, please contact me or Kathleen Bonette at [kathleen.a.bonette@verizon.com](mailto:kathleen.a.bonette@verizon.com).

A handwritten signature in cursive script that reads "Bonnie L. Metz".

VERIZON DELAWARE LLC

Attachments

## **EXPURGATED**

### **VERIZON DELAWARE LLC**

#### **Safety-Valve Relief Application**

##### **Executive Overview**

Verizon Delaware LLC ("Verizon DE") has an urgent need for 3,000 consecutive numbers for a large business customer, XXXXX. Per the attached customer letter, XXXXX is requesting new numbers for expansion.

Verizon DE is unable to fulfill XXXXX's numbering requirements with current inventory. The resources reside in the WLMGDEWLDS0 switch in the Wilmington Rate Center. The Rate Center has approximately 179,327 available numbers distributed over 602 contaminated 1,000-blocks.

Verizon DE has applied to Neustar for the requested numbers in the WLMGDEWLDS0 switch and was denied because it does not meet the MTE and/or Utilization requirements for this rate center. (see attached). Accordingly, under 47 C.F.R. § 52.15(g)(4), Verizon DE asks that the Commission grant its waiver request and direct Neustar to issue Verizon DE the 3,000 consecutive numbers.

1/6/16

Thomas Quirk  
Verizon Communications

Dear Tom,

This letter is to inform you that [REDACTED] is requesting 3,000 consecutive DID for our business expansion. It is imperative that we receive consecutive numbers to communicate with our company's network across the country and dial plan. Out of range and non-consecutive numbers will conflict and prohibit us from managing our network. [REDACTED] will be the contact at [REDACTED]. The addresses are:

Service Address:

[REDACTED]  
[REDACTED]  
[REDACTED] 3

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Please confirm that this is acceptable.

Sincerely,

[REDACTED]  
Senior Director, Network Infrastructure

**DE PSC Docket Number 16-XXX- Wilmington Safety Valve Request**

- 1. A compelling and permissible need for the requested additional numbering resources (with appropriate reference to rules or orders of the FCC).**

Verizon Delaware LLC ("Verizon DE") has an urgent need for 3,000 numbers for one of its customers, XXXXX. Per the attached customer letters, XXXXX is expanding its business and requires 3,000 consecutive numbers in Wilmington. Verizon does not have current inventory to satisfy this customer's requirements.

According to the Third Report and Order and Second Order on Recon. in CC Dkt. No. 96-98 and CC Dkt. No. 99-200, at ¶¶ 61-64, 17 FCC Rcd. 252 (2001) (the "Third Order"), a state commission may grant a carrier's safety valve request when the carrier receives a specific customer request for numbering resources that exceeds the carrier's available inventory.

- 2. A description as to why the granting of the particular application will not run the risk that numbering resources will be inefficiently used.**

Verizon will use the additional numbering resources for only this specific customer, XXXXX, and agrees to return the numbering resources to NeuStar if the customer request is withdrawn or declined. Verizon further agrees that it will not retain the numbering resources to serve other customers without first meeting the FCC's growth numbering resource requirements per ¶64 of the Third Order.

- 3. Written evidence that the NANPA or PA has rejected the carrier's direct request for the additional number resources.**

The rejection letter from NANPA is attached with this filing.

- 4. Describe any long-term impact to numbering resources for the request is granted.**

This request for 3,000 numbers represents less than 1% of the total numbering resources available in this wire center (607,000). As such, granting this request will not result in any long term impacts to the numbering resources in the State of Delaware.



# Pooling Administration System

Dated 19 October 2016

## Thousands-Block Number Pooling Administration Guidelines (TBPAG) - Part 3

Revised: January 4, 2016

### Pooling Administrator's Response/Confirmation

Tracking Number : **302-  
WILMINGTON-DE-  
952133**

Date of Application: **10/19/2016** Effective Date: \_\_\_\_\_  
Date of Receipt: **10/19/2016** Date of Response: **10/19/2016**

Service Provider Name: **VERIZON DELAWARE, INC.**  
(LERG<sup>TM</sup> Routing Guide<sup>1</sup>) OCN: **9210**  
Parent Company OCN: **9200**  
NPAC SOA SPID : \_\_\_\_\_

#### Pooling Administrator Contact Information:

**Agnes Rom** Phone: **925-363-7650**

Signature of Pooling Administrator

**Agnes Rom** Fax: **925-363-7681**

Name (print)

Email: [agnes.rom@neustar.biz](mailto:agnes.rom@neustar.biz)

NPA-NXX or  
NPA-NXX-X : \_\_\_\_\_

Block Assigned: \_\_\_\_\_

Block Reserved : \_\_\_\_\_

Block Reservation  
Expiration Date : \_\_\_\_\_

Block/Code  
Modified : \_\_\_\_\_

Block/Code  
Disconnected : \_\_\_\_\_

Block Contaminated (Yes or No): \_\_\_\_\_

If yes, enter the number of TNs contaminated  
(1-1000): \_\_\_\_\_

Switch Identification (Switching/POI)<sup>2</sup>: \_\_\_\_\_

**WLMGDEWLDS0**

Rate Center: \_\_\_\_\_

**WILMINGTON**

☒ Form complete, request denied.

Explanation:

**DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.**

Request Withdrawn.

Explanation:

Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

<sup>1</sup> Telcordia<sup>®</sup> is a registered trademark and LERG<sup>™</sup> Routing Guide and iconectiv<sup>™</sup> are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

<sup>2</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language<sup>®</sup> Location Code (CLLI<sup>™</sup> Code) of the switching entity/POI shown on the Part 1A form. Common Language<sup>®</sup> is a registered trademark and CLLI is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

# CONFIDENTIAL AND PROPRIETARY ATTESTATION

BONNIE L. METZ, Secretary of Verizon Delaware LLC, hereby attests that the information contained in the attached letter, report, filing or application as provided to the Delaware Public Service Commission should be considered confidential or proprietary and is not subject to inspection by either the public or by other parties unless an appropriate proprietary agreement is executed.

In compliance with (26 *Del. C. Admin.* §1000, 1.11) this filing includes a public version of the document and this signed attestation.

Attested on this date: 10-24-16

Bonnie L. Metz  
Signature  
Bonnie L. Metz  
Name  
Secretary  
Title

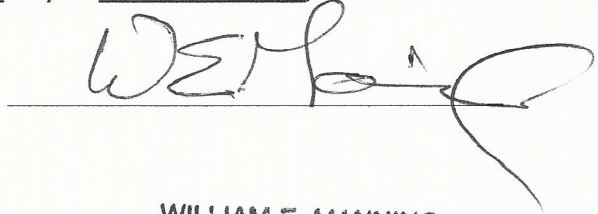
## VERIFICATION

I, BONNIE L. METZ, Secretary of Verizon Delaware LLC, hereby attests that the information contained in the attached letter, report, filing or application as provided to the Delaware Public Service Commission is true and correct to the best of my information and belief.

Attested on this date: 10-24-16

  
\_\_\_\_\_  
Signature  
Bonnie L. Metz  
\_\_\_\_\_  
Name  
Secretary  
\_\_\_\_\_  
Title

Sworn to and subscribed before me this 24 day of Oct, 2016.

  
\_\_\_\_\_

WILLIAM E. MANNING  
Attorney At Law  
Notary Public, State of Delaware  
My Commission Has No Expiration Date  
29 Del.C. § 1323(a)(3)